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22 DURK BANKS

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

19 UNITED STATES,  
20  
21 Plaintiff,  
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23 v.  
24 DURK BANKS,  
25  
26 Defendant.

Case No. 2:24-cr-00621-MWF

**DEFENDANT DURK BANKS'  
UNOPPOSED REQUEST FOR  
ADDITIONAL TIME TO SUBMIT  
HIS REPLY IN SUPPORT OF HIS  
APPLICATION FOR  
RECONSIDERATION OF  
DETENTION ORDER**

25 Defendant Durk Banks, through his attorneys, Drew Findling, Marissa Goldberg,  
26 Jonathan M. Brayman, and Christy O'Connor, hereby files this unopposed request for a  
27 brief extension of time to submit his reply in support of his application for reconsideration  
28

1 of the detention order in this matter. The grounds for this unopposed request are as  
2 follows:

3  
4 1. On April 23, 2025, this Court granted a hearing on Mr. Banks' Application  
5 for Reconsideration of the Detention Order and set a briefing schedule with Mr. Banks'  
6 reply to the government's response due on today's date. (Doc. 139).

7 2. At the end of the day yesterday, one day before the defendant's reply was  
8 due, the government informed defense counsel through e-mail correspondence that they  
9 had gone back to the grand jury and re-indicted the case in a second superseding  
10 indictment against Mr. Banks.

11 3. The government provided a copy of the new indictment to undersigned  
12 counsel on today's date. In the second superseding indictment, the government has  
13 chosen to: (1) remove the allegations regarding Mr. Banks' lyrics previously included  
14 in ¶ 6 of the first superseding indictment; (2) remove an allegation regarding the  
15 payment of a "bounty" previously included in ¶ 9 of the first superseding indictment;  
16 and (3) added an additional charge of stalking resulting in death under 18 U.S.C. §§  
17 2261A(2)(A), (B), 2261(b)(1).

18 4. As this Court is aware, both from the initial detention hearing and the  
19 current briefing on Mr. Banks' application for reconsideration of the detention order,  
20 the government's allegations regarding Mr. Banks' lyrics have been a hotly contested  
21 issue currently before this Court. It appears that the government has conceded the issue,  
22 but the re-indictment of this case raises new factual and legal issues.

23 5. Based on the above, Mr. Banks respectfully requests that this Court give  
24 him a brief extension of time to file his reply so that he and his counsel can review this  
25 new indictment and respond as necessary and appropriate.

26 6. Mr. Banks requests that he be permitted to file his reply on or before  
27 Tuesday, May 6, 2025.  
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1           7.     Undersigned counsel has communicated with counsel for the government  
2 and they have indicated that they do not object to this request.  
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5                               Respectfully submitted,

6     Dated: May 2, 2025

BY: /s/ Marissa Goldberg

7                               Drew Findling

8                               Marissa Goldberg

9                               Jonathan M. Brayman

Christy O'Connor

10                             Attorneys for Durk Banks  
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